

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

CARL BRUCE FANNING and
BRONDENA FANNING,

RECEIVED

CIVIL ACTION NUMBER:

Plaintiffs, 2006 FEB 24 P 2:41

CV05-2663

v.

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

NATIONAL CARRIERS, BRUCE
NORMAN, JR. and ALLSTATE
INSURANCE COMPANY, INC.,

Defendants.

ANSWER

COMES NOW the defendant, Allstate Insurance Company, and answers the complaint as follows, separately and severally:


1. The defendant admits that it provides UIM (underinsured motorist) coverage to the plaintiff subject to the terms and conditions of the applicable Allstate policy.
2. The general issue is plead, and, to the extent not admitted in the preceding paragraph, each and every material allegation contained in the complaint is denied, and strict proof thereof is demanded.
3. Defendant denies that the plaintiff is entitled to recover the items and amount of damages alleged in the complaint and demands strict proof thereof.
4. Defendant avers that he/she is entitled to either a set-off or credit to the extent of all available liability limits of any other defendant.
5. The complaint fails to state a claim for relief.
6. Defendant reserves the right to amend this answer.
7. The defendant asserts any affirmative defenses that may be available to the defendant/tortfeasor in this

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FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
ALABAMA

matter.

TRIAL BY STRUCK JURY IS DEMANDED

By 
Celeste Patton Armstrong
(PAT044)
Attorney for Defendant
Allstate Insurance Company

OF COUNSEL:

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CERTIFICATE OF SERVICE

This is to certify that I have on this date served a copy of the within and foregoing upon:

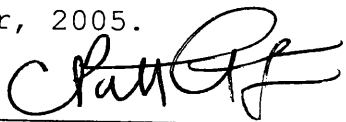
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by placing a copy of same in the United States Mail in a properly addressed envelope with sufficient postage thereon to ensure delivery.

This 15th day of November, 2005.



OF COUNSEL